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Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

ROBERT THURMAN-SILVA, an individual,  
  
Plaintiff,

vs.

EMPLOYBRIDGE SOUTHWEST, LLC d/b/a  
PROLOGISTIX, a Foreign Limited-Liability  
Company; THYSSENKRUPP MATERIALS  
NA, INC.; a Foreign Corporation;  
THYSSENKRUPP SUPPLY CHAIN  
SERVICES NA, INC., a Foreign Corporation;  
and, TESLA MOTORS, INC., a Foreign  
Corporation; DOE BUSINESS ENTITIES 1-  
10; DOE INDIVIDUALS 1-10,  
  
Defendants.

Case No.: 3:19-cv-00683-LRH-WGC

**STIPULATION AND ORDER FOR AN  
EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF'S FIRST AMENDED  
COMPLAINT  
(THIRD REQUEST)**

Pursuant to LR IA 6-1, LR IA 6-2 and LR 7-1, Plaintiff Robert Thurman-Silva ("Plaintiff")  
and Defendants Thyssenkrupp Materials NA, Inc., Thyssenkrupp Supply Chain Services NA, Inc.,  
(collectively, "Thyssenkrupp"), Tesla Motors, Inc. ("Tesla"), by and through their respective counsel  
of record, hereby request and stipulate to extend the time for Defendants to respond to Plaintiff's

1 First Amended Complaint (ECF No. 2).<sup>1</sup> Defendants' responses to the First Amended Complaint  
2 are currently due March 19, 2020; however, given the COVID-19 Pandemic, Defendants request an  
3 extension of time up to and including March 30, 2020 in which to respond. This is the parties' third  
4 request for an extension of time.

5 This Stipulation is made in good faith and is not intended for purposes of delay.

6 DATED this 19th day of March, 2020.

DATED this 19th day of March, 2020.

7 THE GEDDES LAW FIRM, P.C.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,  
P.C.

9 /s/ Kristen R. Geddes

/s/ Dana B. Salmonson

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Attorneys for Defendants  
Thyssenkrupp Materials NA, Inc.,  
Thyssenkrupp Supply Chain Services NA, Inc.,  
and Tesla Motors, Inc.

**ORDER**

18 IT IS SO ORDERED.

20 *William G. Cobb*

U.S. MAGISTRATE JUDGE

22 March 20, 2020

DATED

26 <sup>1</sup> At this time, Plaintiff intends for this extension to apply to all Defendants, including Employbridge  
27 Southwest, LLC d/b/a Prologistix. Thyssenkrupp and Tesla were amidst finalizing representation  
28 for Employbridge; however, all parties' internal resources have been impacted by COVID-19 and,  
unfortunately, have prevented the parties from finalizing representation.